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*Counsel for Nobuaki Kobayashi, in his capacity
as the Bankruptcy Trustee and Foreign Representative
of MtGox Co., Ltd., a/k/a MtGox KK*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

MtGox Co., Ltd. (a/k/a MtGox KK),

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 14-31229-sgj-15

UNOPPOSED MOTION TO CONTINUE STATUS CONFERENCE

Nobuaki Kobayashi, in his capacity as the bankruptcy trustee and foreign representative (the “Foreign Representative”) of MtGox Co., Ltd., a/k/a MtGox KK (the “Debtor”), a debtor in a bankruptcy proceeding under Japanese law (the “Japan Bankruptcy”), currently pending before the Twentieth Civil Division of the Tokyo District Court, Japan (the “Tokyo Court”), by his

undersigned U.S. counsel, hereby moves (the “Motion”) to continue the Status Conference (the “Status Conference”), which is currently set for August 6, 2014 at 2:30 p.m. (prevailing Central Time). In support of this Motion, the Foreign Representative respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P).

2. Venue for this proceeding is proper before this Court pursuant to 28 U.S.C. § 1410.

RELIEF REQUESTED

3. By this Motion, the Foreign Representative respectfully seeks entry of an order continuing the Status Conference to September 10, 2014 at 1:30 p.m. (prevailing Central Time).

CERTIFICATE OF CONFERENCE

4. On August 5, 2014, counsel to the Foreign Representative, through his U.S. counsel, conferred with the parties-in-interest to the Status Conference. The parties-in-interest do not oppose the relief requested in this Motion.

CONCLUSION

WHEREFORE, the Foreign Representative respectfully requests that this Court (a) grant this Motion and enter an order continuing the Status Conference to September 10, 2014 at 1:30 p.m. (prevailing Central Time), and (b) grant the Foreign Representative such other and further relief as the Court deems just and proper.

Dated: Dallas, Texas
August 6, 2014

GARDERE WYNNE SEWELL LLP

/s/ Marcus A. Helt

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